

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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August 26, 2020

BY ECF

The Honorable Naomi R. Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Sirron Stafford
19 Cr. 377**

Dear Judge Buchwald:

With the consent of the Pretrial Services Agency, I write to respectfully request that the Court modify Mr. Stafford's bail conditions to remove the conditions of GPS monitoring and curfew. On August 6 2019, the following bail conditions were imposed: a \$50,000 personal recognizance bond co-signed by two financially responsible persons; GPS monitoring with curfew; travel limited to SDNY/EDNY; surrender travel documents (and no new applications); Strict pretrial supervision as directed by PTS; Gambling treatment if directed by Pretrial and substance abuse treatment as directed. The conditions were continued after Mr. Stafford's guilty plea on January 13, 2020.

Application denied. To be ordered. Same. Rice Buchwald as to 9/9/20

For over a year, Mr. Stafford has been wearing a GPS monitor and subjected to a curfew. During this time, he has participated in gambling and substance abuse treatment weekly, consistently tested negative for illicit substances, secured and maintained a job at a barbershop, and remained out of trouble. Far from necessary for Mr. Stafford's supervision in the community, the GPS monitor and curfew have become obstacles in Mr. Stafford's active, law-abiding life taking care of his family, working, and participating in treatment. While the government opposes the proposed modifications to Mr. Stafford's conditions of release, Pretrial Services Officer Keyana Pompey does not object to the requested modifications.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Zawadi Baharanyi
Assistant Federal Defender
(917) 612-2753

SO ORDERED:

HONORABLE NAOMI R. BUCHWALD
United States District Judge

cc: AUSA Ryan Finkel (by ECF)